

1 KAREN L. HANKS, ESQ.  
 2 Nevada Bar No. 9578  
 3 E-mail: karen@hankslg.com  
 4 HANKS LAW GROUP  
 5 7625 Dean Martin Drive, Suite 110  
 6 Las Vegas, Nevada 89139  
 7 Telephone: (702) 758-8434  
 8 *Attorneys for Hillcrest Investments, Ltd.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 HILLCREST INVESTMENTS, LTD., a  
 12 Canadian Corporation; AMERGOSA  
 13 ENTERPRISE, LLC.,

14 Plaintiffs,

15 vs.

16 AMERICAN BORATE COMPANY, a foreign  
 17 corporation; AMERICAN BORATE  
 18 COMPANY of Texas, a foreign corporation;  
 19 STATE ENGINEER, STATE OF NEVADA;  
 20 DEPARTMENT OF CONSERVATION AND  
 21 NATURAL RESOURCES, DIVISION OF  
 22 WATER RESOURCES, a Nevada Political  
 23 Subdivision; RAMM CORPORATION, a  
 24 Nevada Corporation; UNITED STATES FISH  
 25 AND WILD SERVICE, a division of the  
 26 UNITED STATES; NATIONAL PARK  
 27 SERVICE, a division of the UNITED  
 28 STATES; DOES I – V; and ROES VI – X,

Defendants.

Case No. 2:21-cv-00964-RFB-NJK

**STIPULATION AND ORDER TO EXTEND  
 DEADLINE TO FILE RESPONSE TO  
 DEFENDANTS' AMERICAN BORATE  
 COMPANY AND AMERICAN BORATE  
 COMPANY OF TEXAS' RENEWED  
 MOTION FOR SANCTIONS**

**(SIXTH REQUEST)**

20 Plaintiffs, HILLCREST INVESTMENTS, LTD., and AMERGOSA ENTERPRISE, LLC<sup>1</sup>  
 21 (“Plaintiffs”), Defendants, AMERICAN BORATE COMPANY AND AMERICAN BORATE  
 22 COMPANY OF TEXAS (collectively “American Borate”) and non-party attorney BYRON  
 23 THOMAS, ESQ., (“Thomas”) hereby stipulate and agree as follows:

24 On June 28, 2022, American Borate filed a renewed motion for sanctions against Plaintiffs  
 25 and Thomas. Based on the filing of a previous stipulation, Plaintiffs’ and Thomas’ response is due  
 26 September 2, 2022. However, Plaintiff, Hillcrest Investments, Ltd. has recently retained new  
 27 counsel, Karen L. Hanks of Hanks Law Group, and Ms. Hanks has communicated with American

28 <sup>1</sup> The proper name is Amargosa Enterprises, LLC.

1 Borate's counsel regarding a potential resolution of the renewed motion for sanctions. However,  
 2 to allow time to issue an offer and negotiate a resolution, the parties agree to extend both Plaintiffs'  
 3 and Thomas' response deadline to September 23, 2022.

4 The parties do not seek this extension to cause delay or prejudice any party.

5 Dated this 2<sup>nd</sup> day of September, 2022.

<p><b>HANKS LAW GROUP</b></p> <p><i>/s/ Karen L. Hanks</i>        Karen L. Hanks, Esq.        Nevada Bar No. 9578        7625 Dean Martin Drive, Ste 110        Las Vegas, Nevada 89139  <i>Attorneys for Hillcrest Investments, Ltd.</i></p>	<p><b>LEONARD LAW, PC</b></p> <p><i>/s/ Debbie Leonard</i>        Debbie Leonard, Esq.        Nevada Bar No. 8260        955 South Virginia Street, Ste 220        Reno, Nevada 89502  <i>Attorney for American Borate Company and        American Borate Company of Texas</i></p>
<p><b>LAW OFFICES OF BYRON THOMAS</b></p> <p><i>/s/ Byron Thomas</i>        Byron Thomas, Esq.        Nevada Bar No. 8906        3275 S. Jones Blvd. Ste 104        Las Vegas, Nevada 89146  <i>As Non-Party and Attorney for Amergosa        Enterprise, LLC</i></p>	

21 **IT IS SO ORDERED.**

22   
 23 **RICHARD E. BOULWARE, II**  
 24 **United States District Court**

25 DATED this 6th day of September, 2022.  
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 27  
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